

UNITED STATES BANKRUPTCY COURT

DISTRICT OF MASSACHUSETTS

EASTERN DIVISION

Bankruptcy Petition#: 17-13016 MSH

MARIA R. SANTOS

Debtor

Chapter 13

Case No. 17-13016 MSH

DEBTOR'S RESPONSE TO THE MOTION TO DISMISS BY THE CHAPTER 13 TRUSTEE

To the Honorable Melvin S. Hoffman:

NOW COMES THE DEBTOR, AND, BY AND THROUGH HIS ATTORNEY, RESPECTFULLY RESPONDS THE MOTION TO DISMISS BY THE CHAPTER 13 TRUSTEE AS FOLLOWS:

1. The Debtor admits the allegations contained in paragraph one of the above named Motion.
2. The Debtor admits the allegations contained in paragraph two of the above named Motion.
3. Debtor admits the allegations contained in paragraph three of the above named Motion.
4. The Debtor can neither confirm nor deny the allegations contained in paragraph four of the above named Motion.
5. The Debtor admits the allegations contained in paragraph five of the above named Motion.

WHEREFORE; THE DEBTOR RESPECTFULLY RESPONDS TO THE ABOVE NAMED MOTION BY STATING THAT SHE HAS NO OBJECTION TO HER CASE BEING DISMISSED AT THIS TIME

OR FOR ANY AND OTHER SUCH RELIEF THAT THIS HONORABLE COURT DEEMS MEET AND JUST

DATED: SEPTEMBER 5, 2018

Debtor, Maria R. Santos

By and through her attorney

/s/ Robert K. Cabana

Robert K. Cabana Esq. BBO 641885

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**United States Bankruptcy Court
District of Massachusetts (Boston)**

In Re:

Chapter 13

Maria R. Santos

Debtor

Case No. **17-13016 MSH**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the following document: DEBTOR'S RESPONSE TO THE MOTION TO DISMISS BY THE CHAPTER 13 TRUSTEE by first class mail postage prepaid or electronic means, the FIFTH DAY of SEPTEMBER in the year 2018 on the following creditors persons in interest:

Assistant U.S. Trustee

John Fitzgerald

Office of the US

Trustee

J.W. McCormack Post

Office & Courthouse

5 Post Office Sq., 10th

Ft, Suite 1000

Boston, MA 02109

Trustee

Carolyn Bankowski-

13-12

Chapter 13-12 Trustee

Boston

P. O. Box 8250
Boston, MA 02114

Deutsche Bank National Trust Company,
as Trustee for J.P. Morgan Mortgage Acquisition
Trust 2007-CH5,
Asset Backed Pass-Through Certificates, Series
2007-CH5 (Creditor)
Richard T. Mulligan Harmon Law Offices, P.C.
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Wells Fargo Bank, N.A. (Creditor)
Tatyana Tabachnick
Orlans PC
PO Box 540540
Waltham, MA
Wsbabin@orlans.com

DATED: September 5, 2018

For the Debtor

Maria R. Santos

By and through her attorney

/s/Robert K. Cabana

Robert K. Cabana

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